

JUL 10 2000

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

FIRST GENERAL COUNSEL'S REPORT

MUR: 4780  
DATE COMPLAINT FILED: July 31, 1998  
DATE OF NOTIFICATION: August 6, 1998  
DATE ACTIVATED: September 17, 1999

EXPIRATION OF STATUE OF  
LIMITATIONS: May 19, 2003  
STAFF MEMBER: Jim Moyer

COMPLAINANT: Kimberly Blom

RESPONDENTS: Harris Corporation  
Jeffrey Stanley

RELEVANT STATUTE: 2 U.S.C. § 441b  
2 U.S.C. § 441c  
11 C.F.R. § 114.2(f)(2)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT  
2000 JUL 11 A 9 56

I. ACTIONS RECOMMENDED

Find no reason to believe that the Harris Corporation and Jeffrey Stanley violated

2 U.S.C. §§ 441b or 441c(a)(1), approve the appropriate letters and close the file.

II. GENERATION OF MATTER

This matter was generated by a complaint filed on July 31, 1998 by Kimberly Blom

("complainant").<sup>1</sup> Complainant alleged that in mandatory staff meetings, Jeffrey Stanley, a Program Manager for Harris Corporation, a government contractor, solicited donations for a

<sup>1</sup> Ms. Blom's "complaint" consists of two similar, but non-identical letters, both dated July 28, 1998. The discussion of the "complaint" in this Report will include information and language from both of those letters.

candidate's political campaign. The complainant also alleged that pressure was placed on Harris Corporation's employees to attend a political fundraiser for the candidate and that she was pressured and threatened with employment termination if she did not attend the political function. If supported, these allegations could constitute violations of 2 U.S.C. §§ 441b and 441c(a)(1). Although both the Harris Corporation and Jeffrey Stanley were separately notified of the complaint as respondents, only the Harris Corporation filed a designation of counsel form and a response. An affidavit from Mr. Stanley, however, was included as an attachment to the Harris Corporation's response. *See discussion infra.*

## II. FACTUAL AND LEGAL ANALYSIS

### A. The Law

The Federal Election Campaign Act of 1971, as amended (the "Act"), prohibits corporations from making "a contribution or an expenditure in connection with any election for federal office." 2 U.S.C. § 441b(a). Corporations (including officers, directors or other representatives acting as corporate agents) are also prohibited from facilitating the making of contributions to candidates or political committees, other than to their own separate segregated funds. 11 C.F.R. § 114.2(f). "Facilitation means using corporate... resources or facilities to engage in fundraising activities in connection with any federal election" *id.*, and includes "[u]sing coercion, such as the threat of a detrimental job action, [or] the threat of any other financial reprisal... to urge any individual to make a contribution or engage in fundraising activities on behalf of a candidate or political committee." 11 C.F.R. § 114.2(f)(2)(iv). Exceptions to the general prohibition against corporate facilitation of contributions include the

"[s]oliciting of contributions to be sent directly to candidates if the solicitation is directed to the [corporation's] restricted class...." 11 C.F.R. § 114.2(f)(4)(ii). Pursuant to 11 C.F.R.

§ 114.1(a)(2)(i), such a restricted class includes a corporation's "stockholders and executive and administrative personnel and their families," with whom a corporation may communicate on any subject." *See also* 11 C.F.R. § 114.3(a). In addition, the Act prohibits federal contractors from making, directly or indirectly, "any contribution of money or other things of value ... to any political party, committee or candidate for public office or to any person for any political purpose or use." 2 U.S.C. § 441c(a)(1).<sup>2</sup>

**B. The Complaint**

Complainant Kimberly Blom asserts that she worked for nine months, on a contract basis, for the Harris Corporation ("Harris") on the Alaskan National Airspace Interfacility Communications System ("ANICS"), a Federal Aviation Administration ("FAA") project for which Harris is a direct contractor. The complainant alleges that the ANICS project ran into funding issues, but that by the end of May, 1998, the funding issues were cleared up. The complainant avers that Jeffrey Stanley, Program Manager for ANICS, took the credit for this improved situation due to his "networking with various congressmen and senators."

According to the complaint, in early May, 1998, all ANICS employees were invited to attend a political fundraiser on May 26, 1998, for a politician who had allegedly helped rectify

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<sup>2</sup> Any contribution in connection with federal elections from a corporate federal contractor would also violate 2 U.S.C. § 441b(a).

the funding situation.<sup>3</sup> The complainant alleges that "[t]hroughout the week before the fundraiser, continual pressure was repeatedly placed on the employees of the ANICS project to attend." According to the complainant, this pressure was especially intense during mandatory staff meetings. The complainant further states, "The type of pressure that was applied insinuated that not attending this fund-raiser would reflect poorly on an individual and they could be perceived as not being a team player." The complainant asserts that "[t]his, as it had been stated by Jeff Stanley on many occasions -- in no uncertain terms, was grounds for termination." The complainant alleges that on either May 21 or May 22, 1998, Mr. Stanley, during a mandatory staff meeting, "openly and clearly solicited for campaign donations to the politician" for whom the fundraiser was being held.

According to the complainant, she was unable to attend the political fundraiser on May 26 due to outside obligations. She alleges that, on May 27 and 29, 1998, Mr. Stanley once again, in mandatory staff meetings, "openly and clearly solicited" contributions for the same campaign and commented, at the May 27 meeting, that several thousand dollars had been raised for the politician the night before. The complainant further states that, during the solicitations by Mr. Stanley, he mentioned "all the effort on the part of the politician to keep ANICS funded." "Thus," the complainant continues, "insinuating that we owed this politician our jobs and should feel obligated to make a donation."

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<sup>3</sup> The complainant states that she did not mention the name of the political candidate involved because he was not involved or present when Mr. Stanley made the alleged solicitations, and she has no reason to believe that he was aware of Mr. Stanley's action. Harris Corporation's response identified the candidate as Alaskan Congressman Don Young.

...According to the complainant, the project assigned to her was deemed critical. The complainant states that, during the week following the fundraiser, the project was removed from the management of her supervisor and reassigned to the project's receptionist. Thereafter, complainant avers, at the request of Mr. Stanley she was reassigned to another effort. Within a few days, this new effort was also reassigned from the management of her supervisor and assigned to the receptionist. The complainant states that on June 17, 1998, her supervisor informed her "that if I didn't show any productive contribution to the project by the end of the week my position would be in jeopardy." When she asked about being productive in light of Mr. Stanley's reassignment of all of her projects, the complainant was assertedly told to "just show something." According to the complainant, "[d]ue to the targeting effort including almost immediate...removal of all my responsibilities within the project," she was forced to resign her contract position with Harris on June 19, 1998. The complainant states that "these actions on Jeff Stanley's part were taken immediately after I did not attend a political candidate's function.... As it is very evident, not attending the political function had detrimental, and immediate effects on my position with Harris Corporation."

### C. The Response

#### 1. Factual Arguments Supporting Harris' Position that It Made No Contribution, Expenditure, or Solicitation

Counsel for Harris filed responses on September 18, 1998 and May 22, 2000.<sup>4</sup> According to Harris, the complaint is based on what complainant felt was "insinuated" or what she speculated were the "perceptions" of others, not on objective facts. Harris contends that complainant's perceptions were inconsistent with those of co-workers who attended the same meetings, and denies that Mr. Stanley made statements encouraging or pressuring staff to attend the fundraiser or to contribute to Don Young. Moreover, Harris asserts that no action was taken against any staffer based on whether he or she attended the fundraiser or contributed to Young.<sup>5</sup> To support its positions, Harris has provided five sworn affidavits, including two from Mr. Stanley.

In his first affidavit, Mr. Stanley states that he is the Program manager for the ANIC project, a contract Harris has with the FAA. Harris' principal subcontractor is New Horizons Telecom, Inc. ("New Horizons"). As part of the ANICS project, Harris and New Horizons proposed constructing radomes, or igloo-like structures, to house communications equipment.

According to Mr. Stanley, in April 1998 he became aware that New Horizons planned to hold an open house at its new corporate headquarters. He knew that Congressman Don Young

<sup>4</sup> The complainant originally filed two letters of complaint dated July 10, 1998. The letters were returned to the complainant because the letters were not properly sworn to. The complainant corrected the problem and resubmitted both letters of complaint on July 28, 1998. The notification package that was sent to the Respondents contained copies of the two improper complaint letters, but not copies of both proper complaint letters. The letter that was omitted from the notification package carried additional allegations that had not been addressed in Harris' original response. The supplemental response addresses those additional allegations. See Attachment 1.

<sup>5</sup> In the response, Harris does not comment as to whether or why the complainant's projects were reassigned.

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would be holding a fundraiser in another part of the New Horizons building the same day. He felt this "would present an excellent opportunity to demonstrate the Harris/New Horizons ANICS Phase II radome approach to as many people as possible." Mr. Stanley further states that, approximately one week to ten days preceding the May 26<sup>th</sup> site demonstration, he made an announcement during a regular ANICS staff meeting that a radome demonstration would be conducted and that ANICS employees were invited to attend. According to Mr. Stanley, he also announced that New Horizons was holding an open house and that Congressman Young would be holding a fundraiser in the same building, "but that no Harris employee should feel compelled to attend the fundraiser."<sup>6</sup> Mr. Stanley avers that on either May 25 or May 26, 1998, during a staff meeting, he remembers reminding all Harris ANICS employees of the demonstration, at which he encouraged their attendance, and of the New Horizons open house. According to Mr. Stanley, "I again reminded the staff that although a fundraiser was also being held in the New Horizons building, no one was obliged to attend or contribute." Mr. Stanley states that other than the announcements made during the regular ANICS staff meetings, no other announcements concerning the fundraiser were made orally, by e-mail, in writing or otherwise.

In his first affidavit, Mr. Stanley further states that he did not keep, nor ask any Harris employee to keep, any record of who attended the fundraiser, nor did he solicit comments after the fundraiser as to whether employees attended or contributed. While he himself made a \$1,000 personal contribution to Young after the event, he does not know if any other Harris employees

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<sup>6</sup> According to Mr. Stanley, he recalls one Harris employee inquiring after the meeting whether it was appropriate to contribute to the Young campaign and he responded that "donations were purely voluntary and up to each individual employee."

contributed to Young. He denies taking any action based on any employee or contractor employee attending or not attending the fundraiser. Moreover, he avers that he made no comments directly or by implication with respect to Harris employees or contractor employees "contributing to, supporting, or endorsing Mr. Young for Congress."

In his second sworn affidavit, Mr. Stanley denies complainant's allegations that he "openly and clearly" solicited campaign contributions during general staff meetings on May 27, 1998 and May 29, 1998, by stating: "At no time while at Harris did I solicit any contributions for any candidate for any elective office." As for the allegations that, during a staff meeting on May 27, 1998, he stated that several thousand dollars were raised for the politician the evening before, and that he insinuated that Harris employees owed their jobs to Congressman Young, Mr. Stanley responds that "[t]hese allegations are also untrue. At no time did I ever discuss the results of any fundraiser with Harris staff nor did I ever state or otherwise insinuate or imply that we owed our jobs to any politician."

Harris also has provided a sworn affidavit from James Krulic. Mr. Krulic is Deputy Program Manager for a Harris subsidiary, is a member of the ANICS project staff, and reports to Mr. Stanley.<sup>7</sup> According to Mr. Krulic, he attended an ANICS staff meeting in mid-May 1998, at which Mr. Stanley advised that a site demonstration, with FAA officials attending, was scheduled for May 26, 1998, on the grounds of the New Horizons building; Mr. Stanley urged everyone at the meeting to attend the site demonstration. Mr. Krulic states that Mr. Stanley also

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<sup>7</sup> Mr. Krulic states that, prior to joining Harris in 1993, he was a Lt. Colonel in the United States Air Force, where he served for more than 24 years.



indicated there would be an open house and a Don Young fundraiser in the New Horizons building at about the same time. Mr. Krulic avers that Mr. Stanley stated that "we were not obligated to attend that function or to contribute funds to Young's campaign.... At no time did Mr. Stanley attempt in any way to solicit funds or contributions for Mr. Young's campaign nor did he request that we attend the campaign event." According to Mr. Krulic, it was clear to him that Mr. Stanley's primary focus was to have the ANICS team witness the site demonstration. Mr. Krulic further states: "[T]here was absolutely no pressure of any kind conveyed by Mr. Stanley that any Harris ANICS team member was required or expected to contribute anything to the Don Young fundraiser." Mr. Krulic continues: "[A]t no time did Mr. Stanley attempt in any way to solicit funds or contributions for Mr. Young's campaign nor did he request that we attend the campaign event." Finally, Mr. Krulic states that at no time after May 26, 1998, did Mr. Stanley ask him to contribute, nor did he have any knowledge that any other ANICS or contract employee attended the Young event or made a contribution to the campaign.

Harris also submitted two sworn affidavits from Thomas A. Lamb. Mr. Lamb states in his first affidavit that he worked for a Harris subsidiary during the time in question, was employed on the ANICS project, and, while reporting to another person, provided financial and accounting support to Mr. Stanley.<sup>8</sup> According to Mr. Lamb, he attended an ANICS staff meeting in late May 1998, at which Mr. Stanley advised that there would be a site demonstration at the New Horizons facilities on May 26, 1998, to which everyone was invited. Mr. Lamb states that Mr. Stanley also advised that there would be an open house and a Don Young campaign

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<sup>8</sup> Mr. Lamb states that, prior to joining Harris, he retired from the United States Air Force after 20 years of service.

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fundraiser in the New Horizons building. Mr. Lamb also states that Mr. Stanley "made it clear that attending the Young fund raiser was entirely voluntary and was up to each individual employee to decide." Mr. Lamb further states that he did not feel obligated to attend the fundraiser or to contribute money, and, in fact, he did neither. According to Mr. Lamb, "I am opposed to Don Young's political philosophy." Mr. Lamb avers: "No adverse action of any kind was taken against me because of my decisions." In addition, Mr. Lamb states: "[N]o pressure of any kind was applied by Mr. Stanley either directly or by implication to attend any of the May 26 activities." According to Mr. Lamb, the focus of Mr. Stanley's message was for as many employees as possible to see the site demonstration. Finally, Mr. Lamb states, "At no time did Mr. Stanley, after the event, inquire of me or to my knowledge anyone else working on the ANICS program as to whether I attended the event or donated to the campaign."

In his second sworn affidavit, Mr. Lamb, who is no longer employed by Harris, states: "I understand that there has been an allegation that during a general, mandatory staff meeting on either May 21, 1998 or May 22, 1998, Jeff Stanley 'openly and clearly solicited' for campaign donations to the politician at the fund-raiser the following Tuesday evening." Lamb further states: "I understand that it has been further alleged that Mr. Stanley 'clearly and openly solicited donations for this politician's campaign' during general staff meetings on May 27, 1998 and May 29, 1998." According to Lamb, "Given my involvement as a Harris employee in the ANICS project, I would have attended all general staff meetings in May 1998, including the ones referenced in the allegations noted above." Mr. Lamb continues: "Given that I am opposed to Don Young's political philosophy, I would remember if anyone, especially Mr. Stanley as

Program Manager, had solicited contributions to Don Young's campaign on Harris' property.

Contrary to the allegations, Mr. Stanley made no statements at those staff meetings or at any other Harris meeting that I attended, soliciting funds for Don Young or for any other candidates."

Mr. Lamb additionally states: "I never heard Mr. Stanley make any statements about the amount of money raised at a fundraiser. Moreover, Mr. Stanley in no way insinuated that we owed our jobs to Congressman Young nor did he in any way endorse Don Young's candidacy." Mr. Lamb concludes: "Given my opposition to Mr. Young, I would have certainly remembered had Mr. Stanley made any positive statements about Don Young or about the amount of money contributed at [sic] Young fundraiser."

## 2. Harris' Legal Arguments

Based on the facts and assertions set forth above, Harris argues in its first response that it did not violate the Act either in its role as a government contractor or as a corporation. First, Harris argues that the complainant does not allege that Harris as a corporation "made a contribution, expenditure or solicitation in connection with any election." Harris characterizes the statements at issue as those of Mr. Stanley, a Harris employee, advising other employees about a fundraiser that was to occur at the same time and place as a site demonstration and an open house, two non-election related events. According to Harris, because the political event would be occurring in proximity to the site demonstration, "Mr. Stanley found it necessary to advise employees beforehand of the fundraiser and to couple it with an express disclaimer."

Harris asserts that "[a] passive statement, especially one not intended to have political overtones, when coupled with a disclaimer cannot constitute a solicitation." Harris states that, in

Commission advisory opinions regarding "passive" corporate conduits, the corporations' purposes were to inform individuals outside of the restricted class about "inherently political matters such as pending legislation...." Harris argues that, in contrast, the purpose of Mr. Stanley's statements to the Harris staff was not political and thus not even those of a passive conduit, but was to inform them of an engineering event and to encourage their participation in that event. Further, Harris states that Mr. Stanley's other statements were made "...out of abundance of caution, [when he] advised them that they were under no obligation to attend the fundraiser or to contribute to Young."

#### **D. Analysis**

Under 2 U.S.C. § 441b, a corporation is prohibited from making any contribution or expenditure in connection with any campaign for an elected Federal office. The Act also prohibits federal contractors from making contributions to any campaign for Federal office. 2 U.S.C. § 441c(a)(1). In the current matter, the complainant does not allege that Harris made direct contributions or expenditures related to a Federal campaign, nor has a search of reports filed by Harris' Political Action Committee ("PAC") and the Young campaign in 1998 revealed any Harris contributions to or expenditures on behalf of the Don Young campaign. The only contribution that could be associated with Harris is the \$1,000 contribution made by Jeffrey Stanley to the Young campaign; however, there is no evidence that any funds other than Mr. Stanley's personal funds were utilized for this purpose. No other individuals identified as Harris employees were disclosed as contributors to the Young campaign.

As stated above, pursuant to 11 C.F.R. § 114.2(f), corporations, including government contractor corporations, are prohibited from facilitating the making of contributions, including using corporate resources and facilities or using coercion to urge any individual to make a contribution or to engage in fundraising activities on behalf of any candidate or political committee.<sup>9</sup> In the instant matter, the complainant, in alleging impermissible contributions and coercion to make contributions, mainly relies on what she perceived and what she felt was insinuated.<sup>10</sup> While broadly alleging that Mr. Stanley "openly and clearly solicited" contributions at staff meetings, she provides no direct statements except to assert that Mr. Stanley commented after a fundraiser that several thousand dollars had been raised for a candidate, a statement denied by both Mr. Stanley and by Thomas Lamb.

The complainant apparently perceived that the reason Mr. Stanley informed the attendees at ANICS staff meetings about the Young fundraiser was so that donations would be made in support of the Young campaign, i.e., she perceived that his remarks constituted a solicitation of contributions. Further, the complainant also apparently perceived that employees' failures to attend the event would reflect poorly on those employees by indicating that they were not "team players," and would thus be grounds for termination, i.e., that the corporation had applied coercion to assure attendance at the fundraiser.

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<sup>9</sup> There appears to be no dispute that the fundraising event was held away from Harris' corporate premises, and therefore there are apparently no issues to be addressed of Harris corporate facilities being used for the event itself.

<sup>10</sup> Mr. Stanley in his affidavit asserts that Ms. Blum "was never an employee of the Harris Corporation, but rather an employee of Superior Design, Inc., . . . and attended the regular staff meetings as an employee of this other corporate entity." Ms. Blum identifies herself as a contract employee of Harris. In either event, it would appear that the complainant was not within the "restricted class" from whom Harris could have facilitated contributions. See 11 C.F.R. § 114.1(c)(iv).

Denying any intent to solicit or coerce, Mr. Stanley, in his first sworn affidavit, asserts that his purpose in announcing the radome demonstration, and in mentioning the contemporaneous New Horizons open house and Young fundraiser, was to encourage his staff's attendance at the demonstration and open house and to inform them of the fact that the fundraiser would be held at the same time. Moreover, Mr. Stanley avers that he told the staff on two occasions that attendance at the fundraiser was "purely voluntary" and that "no one was obligated to attend or contribute." He additionally states that "[a]t no time while at Harris did I solicit any contributions for any candidates for any elective office." Both Mr. Krulic and Mr. Lamb, in their affidavits, have stated that they perceived Mr. Stanley's comments as merely informing staff of all the events in the New Horizons building, and they recalled express statements that they were not required to attend the fundraiser.

In several advisory opinions, the Commission has indicated that a corporation may act as a "passive conduit," to persons beyond the restricted class, of information regarding the activities of its own or another PAC, as long as the corporation does not encourage support of, or facilitate contributions to, the PAC. See Advisory Opinions 1982-65, 1988-2, and 1991-3. By analogy, if Mr. Stanley confined his remarks as stated by the Harris affiants, it does not appear that Respondents violated the Act.

In addition, the complainant has not shown that an adverse job action was taken against her based on her failure to attend the fundraiser or to contribute to Don Young. Mr. Stanley avers that no action was taken against any staffer on this basis, that he kept no records nor asked anyone to keep records of who attended the event, and that he made no inquiries after the event

as to who attended or contributed. Consistent with this, Mr. Lamb, in his first affidavit, has asserted that he neither attended the fundraiser nor made any contributions to the Don Young campaign, and that there was no retaliatory action taken against him. According to their affidavits, neither Mr. Lamb nor Mr. Krulic heard of, or were aware of, Mr. Stanley's having kept a record of attendance of Harris employees at the Don Young fundraiser. Both of these affiants state that, to their knowledge, Mr. Stanley did not inquire into whether they or any other member of the ANICS program had attended the fundraiser. In addition, the complainant has presented no evidence that others who made no contributions to the Young campaign or who did not attend the fundraiser felt coerced before the event or later were sanctioned by Mr. Stanley or Harris.

To the extent that there remain any disputes of fact or perception between the complainant and Respondents, it would appear that the public, objective evidence negates complainant's assertions. As stated above, disclosure records indicate that Jeffrey Stanley was the only Harris employee to make a contribution to the Don Young campaign. If the complainant's perceptions were correct, logically, more Harris employees would have contributed to the Don Young campaign out of a fear of job reprisal if they did not. Moreover, the Harris PAC made no contributions to the Young campaign, as would have been expected had the corporation wanted to show its "gratitude" to him.

In summary, there is insufficient evidence for concluding that a solicitation for the Young campaign by a Harris employee occurred or that the complainant's reported job difficulties were


connected to her not attending the Young fundraiser. Accordingly, this Office recommends the Commission find no reason to believe that the Harris Corporation or Jeffrey Stanley violated 2 U.S.C. § 441b or 441c(a)(1).<sup>11</sup>

III. RECOMMENDATIONS

1. Find no reason to believe that Harris Corporation or Jeffrey Stanley violated 2 U.S.C. §§ 441b or 441c(a)(1).
2. Close the file.
3. Approve the appropriate letters.

Lawrence M. Noble  
General Counsel

7/7/00  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachment  
Supplemental Response to Complaint

<sup>11</sup> Section 441b(a) makes it a specific and individual violation of 2 U.S.C. § 441b for "...any officer...of any corporation...to consent to any contribution or expenditure by the corporation...prohibited by this section." See also 11 C.F.R. § 114.2(d). In the instant matter, even if there were a factual basis supporting Harris' liability under Section 441b on an agency basis, there is no evidence showing that Mr. Stanley is an "officer" of the Harris Corporation. Accordingly, there would be no basis to support a finding that Mr. Stanley violated 2 U.S.C. § 441b. Additionally, 2 U.S.C. § 441c(a)(2) prohibits the solicitation of contributions from government contractors. It does not extend this prohibition to contributions by a contractor's employees. See 11 C.F.R. § 115.6.





# FEDERAL ELECTION COMMISSION

Washington, DC 20463

## MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel **KCS**

DATE: July 11, 2000

SUBJECT: MUR 4780-First General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

### CIRCULATIONS

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NON-SENSITIVE



72 Hour TALLY VOTE ☒

24 Hour TALLY VOTE ☐

24 Hour NO OBJECTION ☐

INFORMATION ☐

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REGULATIONS ☐

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